

**IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN
DISTRICT OF MISSOURI**

TERI DEAN,)	
)	
Plaintiff,)	Cause No. 5:19-cv-06022-srb
)	
)	
EDWARD BEARDEN, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF DEFENDANT PRECYTHE

COMES NOW, ANNE L. PRECYTHE, and states as follows:

1. I am employed as the Director of the Missouri Department of Corrections (MDOC).
2. I have served in this capacity since February of 2017.
3. I have no previous employment with the state of Missouri.
4. As MDOC Director, I rely on a team of Division directors, and employees of the Office of Professional Standards who manage all MDOC internal investigations and personnel matters.
5. I had no personal knowledge of claims by Plaintiff prior to the filing of this lawsuit.
6. I have no personal knowledge of the investigation or investigations of claims made by Plaintiff.
7. I was not aware of specific allegations against Defendant Bearden prior to the filing of this lawsuit.
8. I have no personal knowledge of specific allegations against the other Defendants in this lawsuit.

9. Following investigation or investigations by MDOC, I have at no time been made aware of substantiated claim or claims against Defendants Bearden, Reed, Mustain, or Mosier.
10. I reasonably rely on a system of Department authorities to investigate any inmate allegations and to properly respond when necessary.

STATE OF)
) ss.
COUNTY OF)

The undersigned swears that the matters set forth are true and correct to the best knowledge and belief of the undersigned, subject to the penalties of making a false affidavit or declaration.

Amel. prucythe

The foregoing was subscribed and sworn to before me this 13TH day of August, 2021.

Donna Higgins

NOTARY PUBLIC



DONNA HIGGINS
My Commission Expires
June 1, 2023
Moniteau County
Commission #15897190

My Commission Expires: 6-01-2023